

# ROBINSON, McFADDEN & MOORE, P.C.



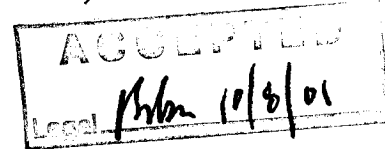
CELEBRATING A CENTURY  
OF SERVICE TO  
CLIENTS AND COMMUNITY

DAVID W. ROBINSON, II  
JOHN S. TAYLOR, JR.  
DANIEL T. BRAILSFORD  
FRANK R. ELLERBE, III  
THOMAS W. BUNCH, II  
J. KERSHAW SPONG  
D. CLAY ROBINSON  
R. WILLIAM METZGER, JR.\*\*  
KEVIN K. BELL  
LYDIA A. ELOFF \*\*  
ANNEMARIE B. MATHEWS †  
BONNIE D. SHEALY  
CHARLES H. McDONALD  
MARGARET L. RIDDLE

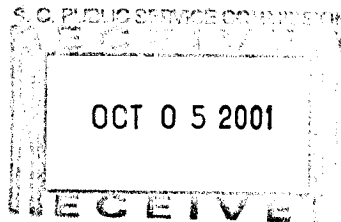
\*\* Certified Specialist in Bankruptcy  
and Debtor-Creditor Law  
† Also Admitted in North Carolina

DAVID W. ROBINSON  
(1869-1935)  
DAVID W. ROBINSON, JR.  
(1899-1989)  
J. MEANS McFADDEN  
(1901-1990)  
THOMAS T. MOORE  
RETIRED  
JAMES M. BRAILSFORD, III  
RETIRED

October 5, 2001



129721



Mr. Gary E. Walsh, Executive Director  
South Carolina Public Service Commission  
Synergy Business Park, Saluda Building  
101 Executive Center Drive  
Columbia, SC 29210

Re: BellSouth Telecommunications, Inc.  
Section 271 Application  
Docket No. 2001-209-C

Dear Mr. Walsh:

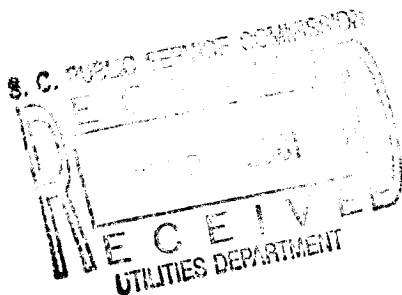
Enclosed for filing please find late filed hearing exhibits 65 and 66 on behalf of KMC Telecom III, Inc. in the above referenced docket. Please date-stamp the extra copies provided as proof of filing and return them with our courier. By copy of this letter we are serving the same on BellSouth and the other Intervenor of record.

If you have any questions, please have someone on your staff contact me.

Yours truly,

ROBINSON, McFADDEN & MOORE, P.C.

Frank R. Ellerbe, III



FRE/bs  
Enclosures

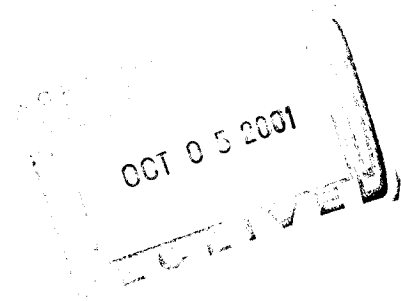
cc/enc: All Parties of Record  
Andrew M. Klein, Esquire  
Mr. John McLaughlin  
Ms. Susan Berlin  
Ms. Nancy Horne  
Ms. Lori Reese



Founding member of  
Commercial Law Affiliates,  
with independent  
law firms worldwide

**BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
Docket No. 2001-209-C**

**In Re:** )  
 )  
**Application of** )  
**BellSouth Telecommunications, Inc.** )  
**To Provide In-Region InterLATA** )  
**Services Pursuant to Section 271** )  
**of the Telecommunications Act of 1996** )  
\_\_\_\_\_ )



KMC TELECOM III, INC.

LATE FILED HEARING EXHIBIT NO. 65



## EXHIBIT 65

Company Name	STATUS	Premature Cut	PF Order	Chronic T1 Prob	Parity	Incorrect Srvc Installed
Customer Account 1	Lost Acct	X	X			
Customer Account 2		x				
Customer Account 3	Lost Acct	X				
Customer Account 4						
Customer Account 5						
Customer Account 6			X			
Customer Account 7				X		
Customer Account 8						X
Customer Account 9		x				
Customer Account 10			X			
Customer Account 11			X	X		
Customer Account 12	Lost Acct					
Customer Account 13	Lost Acct	X				
Customer Account 14						
Customer Account 15						
Customer Account 16						
Customer Account 17						
Customer Account 18						
Customer Account 19	Lost Acct					
Customer Account 20						
Customer Account 21						
Customer Account 22						
Customer Account 23						
Customer Account 24						
Customer Account 25	Lost Acct	X				
Customer Account 26						
Customer Account 27						
Customer Account 28						
Customer Account 29	Lost Acct					
Customer Account 30						
Customer Account 31		X				
Customer Account 32						
Customer Account 33						
Customer Account 34						
Customer Account 35		X				
Customer Account 36						
Customer Account 37						
Customer Account 38	Lost Acct					
Customer Account 39						
Customer Account 40	Lost Acct	X				
Customer Account 41						
Customer Account 42		X				
Customer Account 43						
Customer Account 44						
Customer Account 45						
Customer Account 46					X	
Customer Account 47						
Customer Account 48						

## EXHIBIT 65

Company Name	STATUS	Premature Cut	PF Order	Chronic T1 Prob	Parity	Incorrect Srvc Installed
Customer Account 49			X			
Customer Account 50						
Customer Account 51						
Customer Account 52						
Customer Account 53						
Customer Account 54						
Customer Account 55	Lost Acct					
Customer Account 56						
Customer Account 57						
Customer Account 58						
Customer Account 59						
Customer Account 60						
Customer Account 61		x				
Customer Account 62						
Customer Account 63						
Customer Account 64						
Customer Account 65		X				
Customer Account 66						
Customer Account 67		X	X			
Customer Account 68						
Customer Account 69						
Customer Account 70						
Customer Account 71						
Customer Account 72						
Customer Account 73						
Customer Account 74	Lost Acct	X				
Customer Account 75						
Customer Account 76						
Customer Account 77						
Customer Account 78						
Customer Account 79						
Customer Account 80						
Customer Account 81						
Customer Account 82						
Customer Account 83						
Customer Account 84	Lost Acct					
Customer Account 85						
Customer Account 86		X				
Customer Account 87						
Customer Account 88						
Customer Account 89		X		X		
Customer Account 90						
Customer Account 91						
Customer Account 92						
Customer Account 93	Lost Acct					
Customer Account 94						X
Customer Account 95						
Customer Account 96						

**EXHIBIT 65**

<b>Company Name</b>	<b>STATUS</b>	<b>Premature Cut</b>	<b>PF Order</b>	<b>Chronic T1 Prob</b>	<b>Parity</b>	<b>Incorrect Srvc Installed</b>
Customer Account 97	Lost Acct	X				
Customer Account 98	Lost Acct					
Customer Account 99						
Customer Account 100	Lost Acct	X				
Customer Account 101						
Customer Account 102			X	X		
Customer Account 103						X
Customer Account 104	Lost Acct	X			X	
Customer Account 105		x				
Customer Account 106	Lost Acct	X				
Customer Account 107						
Customer Account 108						
Customer Account 109						
Customer Account 110						
Customer Account 111						
Customer Account 112	Lost Acct					

<b>112</b>	<b>19</b>	<b>21</b>	<b>7</b>	<b>4</b>	<b>2</b>	<b>3</b>
------------	-----------	-----------	----------	----------	----------	----------

<b>16.96%</b>	<b>18.75%</b>	<b>6.25%</b>	<b>3.57%</b>	<b>1.79%</b>	<b>2.68%</b>
---------------	---------------	--------------	--------------	--------------	--------------

LD only orders removed

These orders are DS0 loops and DS1 Une with ports

# ROBINSON, McFADDEN & MOORE, P.C.



October 5, 2001

CELEBRATING A CENTURY  
OF SERVICE TO  
CLIENTS AND COMMUNITY

**HAND DELIVERED**

DAVID W. ROBINSON, II  
JOHN S. TAYLOR, JR.  
DANIEL T. BRAILSFORD  
FRANK R. ELLERBE, III  
THOMAS W. BUNCH, II  
J. KERSHAW SPONG  
D. CLAY ROBINSON  
R. WILLIAM METZGER, JR.\*\*  
KEVIN K. BELL  
LYDIA A. ELOFF \*\*  
ANNEMARIE B. MATHEWS †  
BONNIE D. SHEALY  
CHARLES H. McDONALD  
MARGARET L. RIDDLE

Mr. Gary E. Walsh, Executive Director  
South Carolina Public Service Commission  
Synergy Business Park, Saluda Building  
101 Executive Center Drive  
Columbia, SC 29210

Re: BellSouth Telecommunications, Inc.  
Section 271 Application  
Docket No. 2001-209-C

Dear Mr. Walsh:

On behalf of KMC Telecom III, Inc. the following information is submitted as late-filed hearing exhibit 66:

The statement described by KMC witness Gregory was made to KMC employee Dennis Hill by a BellSouth employee named "Jenny." KMC has no further information on the identity of the BellSouth witness.

\*\* Certified Specialist in Bankruptcy  
and Debtor-Creditor Law  
† Also Admitted in North Carolina

This information is submitted pursuant to the Commission's Order No. 2001-962.

DAVID W. ROBINSON  
(1869-1935)  
DAVID W. ROBINSON, JR.  
(1899-1989)  
J. MEANS McFADDEN  
(1901-1990)  
THOMAS T. MOORE  
RETIRED  
JAMES M. BRAILSFORD, III  
RETIRED

Yours truly,

ROBINSON, McFADDEN & MOORE, P.C.

Frank R. Ellerbe, III

FRE/bs



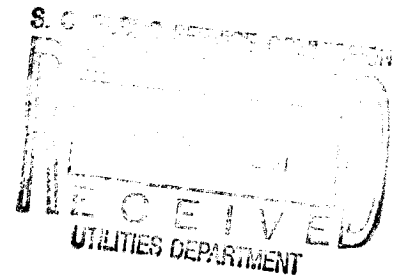
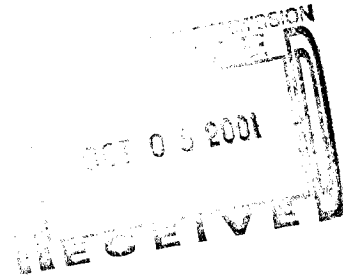
Founding member of  
Commercial Law Affiliates,  
with independent  
law firms worldwide

**BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
Docket No. 2001-209-C**

**In Re:** )  
 )  
 )  
**Application of** )  
**BellSouth Telecommunications, Inc.** )  
**To Provide In-Region InterLATA** )  
**Services Pursuant to Section 271** )  
**of the Telecommunications Act of 1996** )  
\_\_\_\_\_ )

KMC TELECOM III, INC.

LATE FILED HEARING EXHIBIT NO. 66



**BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA**

**Docket No. 2001-209-C**

**In Re:** )  
 )  
**Application of** )  
**BellSouth Telecommunications, Inc.** )  
**To Provide In-Region InterLATA** )  
**Services Pursuant to Section 271** )  
**of the Telecommunications Act of 1996** )  
\_\_\_\_\_ )

**CERTIFICATE OF SERVICE**

This is to certify that I, Barbara Standridge, a legal assistant with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below the **Late Filed Hearing Exhibits 65 and 66 on behalf of KMC Telecom III.** in the foregoing matter by placing a copy of same in the United States Mail, postage prepaid, in an envelope addressed as follows:

L. Hunter Limbaugh, Esquire  
AT&T of the Southern States, Inc.  
1426 Main Street, Suite 1301  
Columbia, South Carolina 2920  
(AT&T)

Faye A. Flowers, Esquire  
Parker Poe Adams & Bernstein  
Post Office Box 1509  
Columbia, South Carolina 29202  
(US LEC)

Darra W. Cothran, Esquire  
Woodward, Cothran & Herndon  
Post Office Box 12399  
Columbia, South Carolina 29211  
(MCI Telecommunications Corporation)

John J. Beach  
Beach Law Firm  
Post Office Box 11547  
Columbia, South Carolina 29211-1547  
(Resort Hospitality Services)

William Austin, Esquire  
Austin, Lewis & Rogers  
Post Office Box 11718  
Columbia, South Carolina 29211  
(BellSouth)

Andrew O. Isar  
7901 Skansle Avenue, Suite 240  
Gig Harbor, WA 98335  
(Assoc. of Comm. Enterprises)

Scott Elliott, Esquire  
Elliott & Elliott  
721 Olive Street  
Columbia, South Carolina 29205  
(United Telephone & Sprint Comm.)

Elliott Elam  
Post Office Box 5757  
Columbia, SC 29250-57  
(Consumer Advocate)



Russell B. Shetterly  
Post Office Box 7157  
Columbia, SC 29202  
(Knology of Charleston & SC)

John J. Pringle  
Post Office Box 11547  
Columbia, SC 29211  
(Access Intergrated Networks, Inc.)

Kennard B. Woods, Esquire  
MCI WorldCom, Inc.  
6 Concourse Parkway, Suite 3200  
Atlanta, GA 30328

Nanette Edwards  
Director of Regulatory Advocacy & Sr.  
Atty  
ITC^ DeltaCom  
4092 S. Memorial Parkway  
Huntsville, Alabama 35802  
(ITC^ DeltaCom)

Caroline Watson, Esquire  
General Counsel  
BellSouth Telecommunications, Inc.  
Post Office Box 752  
Columbia, South Carolina 29202

William Austin, Esquire  
Austin Lewis & Rogers  
508 Hampton Street, 3<sup>rd</sup>. Floor  
Columbia, SC 29202

Scott A. Elliott, Esquire  
Elliott & Elliott  
721 Olive Street  
Columbia, SC 29201

Dated at Columbia, South Carolina this 5th day of September, 2001.

  
Barbara Standridge